U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 28, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report – Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Appendix G*, prepared by Anchor QEA in January/February 2018 and provided comments on May 17, 2018. The *revised Appendix G*, was received from the CPG on October 15, 2018 and the CPG's responses to EPA's comments were received on October 22, 2018. EPA has reviewed the *revised Appendix G* and has eight remaining comment evaluations. Partner agency comments were not received on the revised *Appendix G*. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report *Appendix G* with this letter.

Please proceed with revisions to Appendix G of the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

616150

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix G, dated October 2018

No.	Section	General or Specific	Page No.	Comment
1	N/A	General	N/A	Ensure that references to the sum of 4,4'-DDT, 4,4'-DDE, and 4,4'-DDD throughout Appendix G are consistent (e.g., "total 4,4'-DDx" or "total DDx (sum of 4,4' isomers only)") and are consistently and properly differentiated from total DDx as the sum of 2,4' and 4,4' isomers.
2	2.2, last paragraph, last sentence	Specific	5	Section 2.2 has been added to elaborate on the small volume (sv)-CWCM sampling program. In the new text, clarify that the six samples were intended to capture three rising limb, one peak flow, and two falling limb samples and that the four samples were intended to capture two rising limb, one peak flow, and one falling limb samples.
3	4.1.1, paragraph after Equation 21, first sentence	Specific	13	In response to prior comment #20, new text was added to explain the f_E derived in Equation 21. Clarify what "charged" means when the new text states "the extent to which the Equilibrium and Resistant Domains are fully charged in the sample data is unknown".
4	4.2, second paragraph, last sentence	Specific	14	In response to prior comment #15, new text was added to explain how non-detect SSC data was treated. In the revised text, clarify if f_E would be calculated for a sample that had a non-detect for SSC, and detected values for POC, DOC, particulate chemical, and dissolved chemical. Since SSC is not included in the calculation of f_E from empirical data, a non-detected SSC value should not result in the exclusion of a sample from the f_E parameterization.
5	4.2, fourth paragraph	Specific	14	Revise the sentence that identifies the carbon to chlorophyll-a ratio as follows: "Chlorophyll-a was converted to algal carbon using a conversion factor of 100 mg C/mg Chlorophyll-a, consistent with the value used ***for the summer assemblage of algae*** in the USEPA ST-SWEM model for the LPR FFS (USEPA 2016)." ***(emphasis added to identify requested change)***
6	4.2, third paragraph, last sentence	Specific	17	In the sentence "Given the limited hv-CWCM dataset available to perform the analyses reported in Tables 4-4 and 4-5, the estimated f_E values are roughly consistent with values inferred from literature" either quantify the term "roughly consistent", such as within a factor of "X", or provide range of the literature values referenced as a footnote.
7	Table 1-1	Specific	N/A	Add the event name in place of the "X"s in Table 1-1 (Routine 1 through 4, Low Flow, Routine 5, High Volume 1, High Flow 1, High Flow 2 and High Volume 2). If possible also include the Dundee Dam flow for each event.

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix G, dated October 2018

No.	Section	General or Specific	Page No.	Comment
8	Table 1-3	General	N/A	Include a key to help interpret the meaning of the station identification code.

N/A – Not applicable